

OREGON LIVESTOCK PRODUCERS ASSOCIATION



An Organization Representing Livestock Producers

5/5/03

Bill Sessions
USDA
Washington, DC 20015

Dear Mr. Sessions,

My name is Margene Eiguren and along with my husband and three sons we run a 1500 head cow/calf operation in Jordan Valley, Oregon. I am also secretary of Oregon Livestock Producers Association, an affiliate of R-CALF USA. OLPA is dedicated to the preservation of open, competitive livestock markets. I was one of many to testify at the listening session held in Pasco, WA Friday.

The testimony began with many packer and retail testimonies heard first setting the stage for a debate on the merits and positions re: COOL, rather than on the expressed intent of HOW to implement COOL since it is NOW the law. Personally, I was amazed at the testimony of the retail folks who testified that they oppose telling their customers where the food they purchase for their families comes from!

The position of Oregon Livestock Producers Association re: COOL is as follows:

1.) USDA should require all imported livestock to be permanently marked with a brand or tattoo indicating its country of origin before it enters the United States.

- a.** Labeling imported livestock is not only allowed by existing law, but the rules for doing so are also spelled out. Country of origin markings under present law **DO NOT constitute a mandatory ID system.** WE have to ask what reason does USDA have to refuse to require country of origin markings on imported livestock? GATT 1994 defines a country of origin label on imported products as a "Mark of Origin." It is NOT defined as a "mandatory identification system."
- b.** All livestock not marked with a foreign brand or tattoo should be considered born and raised in the USA.
- c.** There would be no need for mandatory record keeping for livestock producers because the origins of livestock can be determined by whether or not an animal has a foreign marking.
- d.** If producers want to claim that foreign livestock were fed in the United States, they should be allowed to voluntarily keep records to substantiate their claim.

- 2.) **USDA should establish a “grandfather” clause that will allow all livestock presently in the US to be cleared from the system without affecting their value.**
- 3.) **USDA must ensure that retailers cannot impose a greater burden on suppliers than is required by the law or the rules.**
 - a. USDA can accomplish this by stating that only USDA may conduct audits, and all suppliers and retailers must rely solely on the markings on livestock or the representations made on sales transaction documents.
- 4.) **USDA should utilize existing paperwork transactions already used between packers, processors, and retailers to add a country of origin designation.**
- 5.) **USDA should interpret the law to maximize the number of commodities that will be labeled.**
 - a. Enhancing a product by adding water, flavoring, salt, or other seasoning should NOT exclude a commodity from the labeling requirements.
 - b. Cooking, curing, roasting, or restructuring should not exclude a commodity from the labeling requirements. For example, **consumers want to buy bacon and cured hams BUT if these commodities are exempt from labeling, many will never have an opportunity to buy those products.**

Respectfully submitted,

**Margene Eiguren, OLPA Secretary for Mike Smith, Chairman OLPA
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